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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

Genesis Global Holdco, LLC, *et al.*,  
Debtors.<sup>1</sup>

Chapter 11

Case No. 23-10063 (SHL)

Jointly Administered

**VERIFIED STATEMENT  
PURSUANT TO BANKRUPTCY RULE 2019  
OF AD HOC GROUP OF GENESIS LENDERS**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the ad hoc group of lenders (the “Ad Hoc Group of Genesis Lenders”) hereby submits this verified statement (this “Verified Statement”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), and in support hereof respectfully states as follows:

1. In November 2022, the Ad Hoc Group of Genesis Lenders retained Proskauer Rose LLP (“Proskauer”) to represent them as counsel in connection with a potential restructuring

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (as applicable) are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (9564); and Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5<sup>th</sup> Floor, New York, NY 10003.

of Genesis Global Capital, LLC (“GGC”). On January 19, 2023 (the “Petition Date”), GGC and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) in the Chapter 11 Cases each filed voluntary petitions pursuant to chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

2. On January 20, 2023, the Debtors filed the *Debtors’ Motion for Entry of Interim and Final Orders Waiving the Requirements that Each Debtor File a List of Creditors and Authorizing Preparation of a Consolidated List of Creditors, in Lieu of Submitting a Formatted Mailing Matrix, (II) Authorizing the Debtors to File a Consolidated List of the Debtors’ Fifty (50) Largest Unsecured Creditors, (III) Authorizing the Debtors to Redact Certain Personally Identifiable Information, and (IV) Granting Related Relief* [Docket No. 14] (the “Redaction Motion”), pursuant to which the Debtors sought Court authorization to, among other things, have redacted “from any paper filed or to be filed with the Court in these Chapter 11 Cases” certain confidential and personally identifiable information of creditors. On January 27, 2023, the Court entered an interim order [Docket No. 46] (the “Interim Order”) authorizing the redaction, on an interim basis of certain confidential and personally identifiable information of creditors “until the later of (i) Status Conference or (ii) the entry of an order approving the [Redaction] Motion on a final basis after the Final Hearing.” Interim Order, ¶ 7. No final order regarding the Redaction Motion has been entered.

3. In accordance with Bankruptcy Rule 2019, attached hereto as **Exhibit A** is a list of the disclosable economic interests as of the Petition Date of all the members of the Ad Hoc Group of Genesis Lenders.<sup>2</sup> The information set forth herein (including **Exhibit A**) is based

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<sup>2</sup> In accordance with the Interim Order, names and addresses of creditors are not disclosed pending the Court’s final order on the Redaction Motion.

upon information provided to Proskauer by the members of the Ad Hoc Group of Genesis Lenders and is intended only to comply with Bankruptcy Rule 2019.

4. As of the date of this Verified Statement, Proskauer represents only those entities listed on **Exhibit A** in connection with the Chapter 11 Cases. Proskauer does not undertake to represent the interests of, and is not a fiduciary for, any other creditor, party in interest, or other entity. No member of the Ad Hoc Group of Genesis Lenders has or is a party to any agreement to act as a group or in concert with respect to its interests in GGC, and each member of the Ad Hoc Group of Genesis Lenders has the unrestricted right to act as it chooses in respect of such interests without respect to the actions or interests of any other party. In addition, neither the Ad Hoc Group of Genesis Lenders nor any member of the Ad Hoc Group of Genesis Lenders (a) assumed any fiduciary or other duties to any other creditor or person as a result of its membership in the Ad Hoc Group of Genesis Lenders, and (b) does not purport to act, represent, or speak on behalf of any other entities in connection with the Chapter 11 Cases as a result of its membership in the Ad Hoc Group of Genesis Lenders.

5. Nothing contained in this Verified Statement (including **Exhibit A**) is intended to or should be construed as (a) a limitation upon, or waiver of any right to assert, file and/or amend its claims in accordance with applicable law and any orders entered in these Chapter 11 Cases by any member of the Ad Hoc Group of Genesis Lenders, or (b) an admission with respect to any fact or legal theory.

6. Additional creditors of the Debtors may become clients of Proskauer and members of the Ad Hoc Group of Genesis Lenders and certain members of the Ad Hoc Group of Genesis Lenders may cease to be members in the future. The Ad Hoc Group of Genesis Lenders, through its undersigned counsel, reserves the right to amend or supplement this

Verified Statement as necessary for that or any other reason in accordance with the requirements set forth in Bankruptcy Rule 2019.

7. The undersigned verifies that the foregoing is true and correct to the best of his knowledge and that the information contained in **Exhibit A** has been provided by the named entities.

Dated: March 3, 2023

**PROSKAUER ROSE LLP**

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*Counsel to the Ad Hoc Group of  
Genesis Lenders*

**Exhibit A**

**Disclosable Economic Interests of the Members of the Ad Hoc Group of Genesis Lenders<sup>3</sup>**

<b>NAME<sup>4</sup></b>	<b>NATURE AND AMOUNT OF DISCLOSABLE ECONOMIC INTEREST<sup>5</sup></b>
	<b>As of January 19, 2023<sup>6</sup></b>
<b>Lender 1</b>	<ul style="list-style-type: none"><li>• 120 Bitcoin (BTC)</li></ul>
<b>Lender 2</b>	<ul style="list-style-type: none"><li>• 46.4356839 BTC</li></ul>
<b>Lender 3</b>	<ul style="list-style-type: none"><li>• 335.83724574 BTC</li><li>• 335.95423787 Binance Coin (BNB)</li><li>• \$50,805,053.38 USD</li><li>• 8,019,349.89 USD Coin (USDC)</li></ul>
<b>Lender 4</b>	<ul style="list-style-type: none"><li>• 1,000 BTC</li><li>• \$11,000,000.00 USD</li></ul>
<b>Lender 5</b>	<ul style="list-style-type: none"><li>• \$407,758.06 USD</li></ul>
<b>Lender 6</b>	<ul style="list-style-type: none"><li>• 27.326553 BTC</li><li>• \$1,250,000.00 USD</li><li>• 49.549461 Ethereum (ETH)</li></ul>

<sup>3</sup> To the best of Proskauer's knowledge, the information included herein is accurate as of March [2], 2023.

<sup>4</sup> Each entity on this **Exhibit A** holds disclosable economic interests, or acts as investment advisor or manager to funds, entities, accounts and/or their respective subsidiaries that hold disclosable economic interests, in relation to the Chapter 11 Cases.

<sup>5</sup> All interests listed are in Debtor GGC.

<sup>6</sup> All amounts listed herein refer to the principal balance outstanding and do not include prepetition or postpetition interest accrued.

<b>Lender 7</b>	<ul style="list-style-type: none"> <li>• 1,150 ETH</li> <li>• 1,150 Ethereum PoW (ETHW)</li> </ul>
<b>Lender 8</b>	<ul style="list-style-type: none"> <li>• 433.63 BTC</li> <li>• \$10,000,000.00 USD</li> </ul>
<b>Lender 9</b>	<ul style="list-style-type: none"> <li>• 501.68805 BTC</li> </ul>
<b>Lender 10</b>	<ul style="list-style-type: none"> <li>• 3,500 BTC</li> </ul>
<b>Lender 11</b>	<ul style="list-style-type: none"> <li>• 70 BTC</li> </ul>
<b>Lender 12</b>	<ul style="list-style-type: none"> <li>• 35 BTC</li> </ul>
<b>Lender 13</b>	<ul style="list-style-type: none"> <li>• \$20,000,000.00 USD</li> </ul>
<b>Lender 14</b>	<ul style="list-style-type: none"> <li>• 225 BTC</li> </ul>
<b>Lender 15</b>	<ul style="list-style-type: none"> <li>• 82.52173342 BTC</li> <li>• \$50,000,000.00 USD</li> </ul>
<b>Lender 16</b>	<ul style="list-style-type: none"> <li>• 300 BTC</li> <li>• \$2,000,000.00 USD</li> <li>• 1,000 ETH</li> </ul>
<b>Lender 17</b>	<ul style="list-style-type: none"> <li>• 101.4020193 BTC</li> </ul>

<b>Lender 18</b>	<ul style="list-style-type: none"> <li>• 4,3000,000 Tether (USDT)</li> <li>• 3,000 ETH</li> <li>• 260 BTC</li> </ul>
<b>Lender 19</b>	<ul style="list-style-type: none"> <li>• 22.1389 BTC</li> </ul>
<b>Lender 20</b>	<ul style="list-style-type: none"> <li>• \$3,250,000.00 USD</li> </ul>
<b>Lender 21</b>	<ul style="list-style-type: none"> <li>• 40 BTC</li> </ul>
<b>Lender 22</b>	<ul style="list-style-type: none"> <li>• 359.316097 BTC</li> <li>• 20,170.0359 ETHW</li> <li>• 13,664.8728 ETH</li> <li>• \$7,663.44 USD</li> </ul>
<b>Lender 23</b>	<ul style="list-style-type: none"> <li>• 900 BTC</li> <li>• 600 ETH</li> <li>• 1,500 Bitcoin Cash (BCH)</li> <li>• 2,100 Bitcoin SV (BSV)</li> </ul>
<b>Lender 24</b>	<ul style="list-style-type: none"> <li>• 160 BTC</li> <li>• 1,200 ETH</li> <li>• \$5,000,000.00 USD</li> </ul>
<b>Lender 25</b>	<ul style="list-style-type: none"> <li>• 101.79 BTC</li> </ul>
<b>Lender 26</b>	<ul style="list-style-type: none"> <li>• 4,028,166.41 USDT</li> <li>• \$1,230,000.00 USD</li> <li>• 2,500,000 MANA</li> </ul>
<b>Lender 27</b>	<ul style="list-style-type: none"> <li>• \$78,037,054.18 USD</li> </ul>

<b>Lender 28</b>	<ul style="list-style-type: none"> <li>• 3,835,616.21 USDC</li> </ul>
<b>Lender 29</b>	<ul style="list-style-type: none"> <li>• \$6,000,000.00 USD</li> </ul>
<b>Lender 30</b>	<ul style="list-style-type: none"> <li>• 200 BTC</li> <li>• 300 ETH</li> </ul>
<b>Lender 31</b>	<ul style="list-style-type: none"> <li>• 40.90 BTC</li> <li>• 253.80 ETH</li> </ul>
<b>Lender 32</b>	<ul style="list-style-type: none"> <li>• 33.36 BTC</li> <li>• 94.10 ETH</li> <li>• \$42,078.58 USD</li> </ul>
<b>Lender 33</b>	<ul style="list-style-type: none"> <li>• 25.63 BTC</li> <li>• 102.11 ETH</li> <li>• \$275,609.12 USD</li> </ul>
<b>Lender 34</b>	<ul style="list-style-type: none"> <li>• \$40,000.00 USD</li> </ul>
<b>Lender 35</b>	<ul style="list-style-type: none"> <li>• 33,921,915.10 USDT</li> <li>• \$21,078,084.90 USD</li> </ul>
<b>Lender 36</b>	<ul style="list-style-type: none"> <li>• \$3,007,546.76 USD</li> </ul>
<b>Lender 37</b>	<ul style="list-style-type: none"> <li>• 100 BTC</li> </ul>
<b>Lender 38</b>	<ul style="list-style-type: none"> <li>• 8.07537012 BTC</li> </ul>



<b>Lender 39</b>	<ul style="list-style-type: none"> <li>• 210 BTC</li> </ul>
<b>Lender 40</b>	<ul style="list-style-type: none"> <li>• \$11,141,491.11 USD</li> </ul>
<b>Lender 41</b>	<ul style="list-style-type: none"> <li>• \$2,328,748.48 USD</li> </ul>
<b>Lender 42</b>	<ul style="list-style-type: none"> <li>• \$2,328,748.48 USD</li> </ul>
<b>Lender 43</b>	<ul style="list-style-type: none"> <li>• 101.6780599 BTC</li> </ul>
<b>Lender 44</b>	<ul style="list-style-type: none"> <li>• 237.973863 BTC</li> </ul>
<b>Lender 45</b>	<ul style="list-style-type: none"> <li>• 100 BTC</li> </ul>
<b>Lender 46</b>	<ul style="list-style-type: none"> <li>• 251.61 BTC</li> <li>• \$1,120,833.09 USD</li> <li>• 1,800 ETH</li> </ul>
<b>Lender 47</b>	<ul style="list-style-type: none"> <li>• 500 BTC</li> <li>• \$14,552,927.50 USD</li> </ul>
<b>Lender 48</b>	<ul style="list-style-type: none"> <li>• 373.40 BTC</li> <li>• 455.80 ETH</li> </ul>
<b>Lender 49</b>	<ul style="list-style-type: none"> <li>• 800 BTC</li> </ul>

<b>Lender 50</b>	<ul style="list-style-type: none"> <li>• 107.9182463 BTC</li> </ul>
<b>Lender 51</b>	<ul style="list-style-type: none"> <li>• 105 BTC</li> </ul>
<b>Lender 52</b>	<ul style="list-style-type: none"> <li>• 7 BTC</li> <li>• 1,129 ETH</li> </ul>
<b>Lender 53</b>	<ul style="list-style-type: none"> <li>• 25 BTC</li> <li>• \$199,975.00 USD</li> </ul>
<b>Lender 54</b>	<ul style="list-style-type: none"> <li>• \$1,000,000.00 USD</li> </ul>
<b>Lender 55</b>	<ul style="list-style-type: none"> <li>• 1,000 BTC</li> </ul>
<b>Lender 56</b>	<ul style="list-style-type: none"> <li>• \$3,000,000.00 USD</li> </ul>
<b>Lender 57</b>	<ul style="list-style-type: none"> <li>• \$6,522,547.81 USD</li> <li>• 20,000 ETH</li> </ul>
<b>Lender 58</b>	<ul style="list-style-type: none"> <li>• 1,875,000.00 USDT</li> </ul>
<b>Lender 59</b>	<ul style="list-style-type: none"> <li>• 491,499.16 LUNA</li> </ul>
<b>Lender 60</b>	<ul style="list-style-type: none"> <li>• \$41,167,030.83 USD</li> <li>• 49,332,969.17 USDC</li> <li>• 15,000 ETH</li> </ul>

<b>Lender 61</b>	<ul style="list-style-type: none"><li>• <b>\$1,500,000.00 USD</b></li></ul>
<b>Lender 62</b>	<ul style="list-style-type: none"><li>• <b>42.4776816 BTC</b></li></ul>
<b>Lender 63</b>	<ul style="list-style-type: none"><li>• <b>2,000,000.00 USDC</b></li><li>• <b>8,848.82 ETH</b></li><li>• <b>\$11,341,707.92 USD</b></li></ul>
<b>Lender 64</b>	<ul style="list-style-type: none"><li>• <b>731.22039886 BTC</b></li><li>• <b>\$4,389,460.00 USD</b></li></ul>
<b>Lender 65</b>	<ul style="list-style-type: none"><li>• <b>250 BTC</b></li></ul>
<b>Lender 66</b>	<ul style="list-style-type: none"><li>• <b>\$10,000,000 USD</b></li></ul>
<b>Lender 67</b>	<ul style="list-style-type: none"><li>• <b>40 BTC</b></li><li>• <b>400,000 USDC</b></li></ul>
<b>Lender 68</b>	<ul style="list-style-type: none"><li>• <b>50 BTC</b></li></ul>

<b>Lender 69</b>	<ul style="list-style-type: none"> <li>• 1,410.92884773 BTC</li> <li>• 9,891.31002875 ETH</li> <li>• 22,904.26514849 BCH</li> <li>• 54,745,391.16941390 Stellar (XLM)</li> <li>• 33,159.50775739 Chainlink (LINK)</li> <li>• 4,760.48 Uniswap (UNI)</li> <li>• 247.23043184 Aave</li> <li>• 26.20 Compound (COMP)</li> <li>• 4,495.22 Solana (SOL)</li> <li>• 2,276,308.23963206 USDC</li> <li>• 109,223.59087120 Polygon (MATIC)</li> </ul>
<b>Lender 70</b>	<ul style="list-style-type: none"> <li>• 500 BTC</li> <li>• 288,000.00 ETH</li> </ul>
<b>Lender 71</b>	<ul style="list-style-type: none"> <li>• 129.82 BTC</li> <li>• 473.39 ETH</li> <li>• \$108,843.63 USD</li> </ul>
<b>Lender 72</b>	<ul style="list-style-type: none"> <li>• \$7,500,000.00 USD</li> <li>• 7,500,000.00 USDC</li> </ul>
<b>Lender 73</b>	<ul style="list-style-type: none"> <li>• \$1,051,019.62 USD</li> </ul>
<b>Lender 74</b>	<ul style="list-style-type: none"> <li>• 1,600 BTC</li> <li>• \$722,174.00 USD</li> </ul>
<b>Lender 75</b>	<ul style="list-style-type: none"> <li>• 100 BTC</li> </ul>
<b>Lender 76</b>	<ul style="list-style-type: none"> <li>• \$26,005,293.98 USD</li> </ul>

<b>Lender 77</b>	<ul style="list-style-type: none"><li>• <b>525 BTC</b></li><li>• <b>2,528.50 ETH</b></li><li>• <b>\$28,000.00 USD</b></li></ul>
<b>Lender 78</b>	<ul style="list-style-type: none"><li>• <b>\$1,500,000.00 USD</b></li><li>• <b>1,656,000 Gemini Dollar (GUSD)</b></li></ul>